

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VICTORIA EVANOFF, as Administrator of
the ESTATE OF JOHN EVANOFF,
DECEASED
Plaintiff,

vs.

MARSH USA, LLC,

THERESE PERRETTE, and

JOHN DOE DEFENDANTS # 1-2

Defendants.

**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE
EVIDENCE OR REFERENCE TO POTENTIAL INDEMNIFICATION BY
EAST PENN MANUFACTURING COMPANY
AND THE PENNSYLVANIA WORKERS' COMPENSATION ACT**

AND NOW, Defendants Marsh USA, LLC (“Marsh USA”) and Therese Perrette (together, “Defendants”), by and through their undersigned counsel, Goldberg Segalla LLP, respectfully submit the within Motion *in Limine* to Exclude Any Evidence or Reference to Potential Indemnification by East Penn Manufacturing Company or The Pennsylvania Workers’ Compensation Act.

A Brief, Exhibits, and Proposed Order are being filed herewith and are incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court enter Order, substantially in the form appended hereto, granting Defendants' Motion *in Limine* to Exclude Evidence or Reference to Potential Indemnification by East Penn Manufacturing Company or The Pennsylvania Workers' Compensation Act.

Respectfully submitted,

Dated: April 9, 2024

GOLDBERG SEGALLA LLP

/s/ Michael P. Luongo

Michael P. Luongo, Esq. (PA I.D. No. 311948)

Robert M. Hanlon, Esq. (PA I.D. No. 207899)

Joseph Ross, Esq. (PA I.D. No. 318039)

1700 Market Street, Suite 1418

Philadelphia, PA 19103

T: 267.519.6852

F: 267.519.6801

mluongo@goldbergsegalla.com

ghanlonjr@goldbergsegalla.com

jross@goldbergsegalla.com

Attorneys for Defendants

Marsh USA, LLC and Therese Perrette

CERTIFICATE OF NON-CONCURRENCE

I, Michael P. Luongo, Esq., hereby certify that I contacted counsel for Plaintiff regarding possible concurrence with Defendants' Motion *in Limine* and that Plaintiff's counsel did not concur with Defendants' Motion.

s/ Michael Luongo
Michael P. Luongo, Esq.

Dated: April 9, 2024

CERTIFICATE OF SERVICE

I, Michael P. Luongo, Esq., hereby certify that a true and correct copy of the forgoing Motion *in Limine* was served on all counsel of record via ECF on the date below.

s/ Michael Luongo
Michael P. Luongo, Esq.

Dated: April 9, 2024